

EXHIBIT A

James E. Griffith
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312-474-6650

August 19, 2014

Jeffrey Goldstein
Anne Zakaras
Vivian Maier Prints, Inc.
7505 N. Oakley Ave.
Chicago, IL 60630

Re: Vivien Maier Copyright Enforcement

Dear Mr. Goldstein and Ms. Zakaras:

We represent the Estate of the photographer Vivien Maier (the “Estate”) in connection with copyright enforcement, licensing, and intellectual property matters. We are investigating the potential misuse and infringement of copyrighted works whose rights are held by the Estate. Barring a prompt settlement, we anticipate filing litigation against the responsible parties upon completion of our investigation. The purpose of this letter is to notify you of your obligation to take reasonable steps to preserve and retain all hard copy and electronically stored information, as defined by Rule 34 of the Federal Rules of Civil Procedure, relevant to our investigation and potential action.

To fulfill your preservation obligation, you must take reasonable steps to preserve all hard copy documents and electronically stored information relevant to our investigation and potential action, including, but not limited to: (a) suspending your data destruction and backup tape recycling policies; (b) preserving relevant software, including legacy software (unless an exact copy or mirror image is made and stored) and hardware that is no longer in service but was in service during the relevant time period; (c) retaining and preserving necessary information to access, review and reconstruct (if necessary) relevant electronic data, including identification codes and passwords, decryption applications, decompression software, reconstruction software, network access codes, manuals and user instructions; (d) retaining and preserving relevant backup drives and data or other storage media; and (e) any other reasonable steps necessary to prevent the destruction, loss, override or modification of relevant data or documents either intentionally or inadvertently, such as through implementation of your document retention policy. All electronically stored information must be preserved intact and

without modification. This above list is not exhaustive and you must preserve all information relevant to our potential action.

We believe that, among other information, the following relevant information may be in your possession and must be preserved:

- documents, things or electronically stored information related to the copying of works originally created by Vivien Maier, including the creation of any prints made from negatives or other originals;
- documents, things or electronically stored information related to the distribution of works originally created by Vivien Maier;
- documents, things or electronically stored information related to the creation, publication, and distribution of derivative works, compilations, or collective works based on, using, or incorporating the work of Vivien Maier, including any books, periodicals, or motion pictures;
- documents, things or electronically stored information related to or reflecting the ownership, disposition, sale, licensing, or assignment of any works originally created by Vivien Maier or any copies thereof;
- documents, things or electronically stored information related to the digitization of any works originally created by Vivien Maier;
- documents, things or electronically stored information related to the authorship and ownership of works originally created by Vivien Maier;
- documents, things or electronically stored information related to income, profits, or revenues generated by works originally created by Vivien Maier or any copies thereof.

The foregoing list is not exhaustive and you must preserve all relevant information and data.

Preservation of electronically stored information includes preservation not only of the electronic information itself, but also of relevant related data, including: (a) active, archived and deleted copies of electronic information, such as e-mails, voicemails, text messages, instant messages (IMs), calendars, diaries, word processing files, spreadsheets, PDFs, JPEGs, PowerPoint presentations, temporary internet files, cookies and .ZIP files, among others; (b) databases and computer logs; and (c) metadata about the information,

including the date it was created and last was modified and the individual that created it. This data must be preserved whether stored online, offline, in a cloud-based server or in other electronic storage, or on any computers, handheld devices, tablets, cell phones or other devices whether or not in your immediate possession.

Your failure to preserve relevant data may constitute spoliation of evidence, which may subject you to sanctions. We trust that you will preserve for the duration of our investigation and any resulting legal action all relevant hard copy documents and electronically stored information. In the event of a dispute arising out of your failure to preserve documents, we will rely on this letter in court as evidence of our request and notice of your preservation obligations.

We would like to meet with you to discuss the documents and data that are in your possession or control which are pertinent to our investigation and potential action. Please contact me by August 29, 2014 to schedule a telephone conference at a time convenient for you.

Thank you and best regards.

Very truly yours,

James E. Griffith

cc: Gregory J. Chinlund

Michelle Bolos

From: trackingupdates@fedex.com
Sent: Wednesday, August 20, 2014 3:26 PM
To: Shannon Paplawskas
Subject: FedEx MPS Shipment 609457316115 Delivered

This tracking update has been requested by:

Company Name: Mercury Business Services
Name: Shipping Manager
E-mail: spaplawskas@marshallip.com

Our records indicate that the following MPS shipment has been delivered:

Invoice number: 86480
Reference: 86480/32393/G1000
Ship (P/U) date: Aug 19, 2014
Delivery date: Aug 20, 2014 2:52 PM
Sign for by: Signature not required
Delivery location: CHICAGO, IL
Delivered to: Residence
Service type: FedEx Standard Overnight
Packaging type: FedEx Envelope
Number of pieces: 1
Total shipment weight: 0.50 lb.
Special handling/Services: Residential Delivery
Deliver Weekday

Master tracking number: 609457316115 (1 of 1)

Shipper Information	Recipient Information
Shipping Manager	Jeffrey Goldstein and Anne Zakaras
Mercury Business Services	Vivian Maier Prints, Inc.
29 South LaSalle St	7505 N. OAKLEY AVE.
Suite 6	CHICAGO
Chicago	IL
IL	US
US	60630
60603	

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